

143065 AAR

ILLINOIS POLLUTION CONTROL BOARD
December 16, 1982

BEMIS COMPANY, INC.

Petitioner,

v.

ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY,

Respondent.

PCB 82-6

ORDER OF THE BOARD (by I. G. Goodman):

Bemis Company, Inc.'s Motion to Withdraw its permit appeal, filed on December 2, 1982, is hereby granted. This matter is dismissed with prejudice.

IT IS SO ORDERED.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Order was adopted on the 16th day of December, 1982 by a vote of 3-0.


Christan L. Moffett, Clerk
Illinois Pollution Control Board

EPA Region 5 Records Ctr.



293427

mm/BTU/hr rated input coal-fired boiler. Coal is pulverized and blown into the boiler, with oil used for ignition and low fire standby. A second 90 mm BTU/m rated input oil-fired boiler is used as a standby unit. Emissions from the primary boiler are controlled by a centrifugal dust collector and an electrostatic precipitator.

III. POLLUTANTS

Sulfur dioxide is the sole pollutant addressed in this matter.

IV. HISTORY AND AGENCY INVOLVEMENT

A summary of Agency involvement with Bemis Company, Inc. follows:

May 17, 1973 -- On this date the Agency granted an operating permit to Bemis until May 4, 1975 for boilers 1 and 2 at Bemis' Peoria facility. (Appendix A, p. 18)

December 16, 1974 -- By letter of this date, the Agency informed Bemis that their operating permit for boilers 1 and 2 would be expiring on May 4, 1975 and that a re-application would be due on or before February 3, 1975. (Appendix A, p. 17)

December 31, 1974 -- An application for renewal of Bemis' operating permit was received by the Agency on this date. (Appendix B, p. 21-22)

January 13, 1975 -- On this date, the Agency granted an operating permit to Bemis until May 4, 1977. Following an exchange of

correspondence regarding the sulfur content of No. 5 light fuel oil used - by Bemis in this operation, of their boilers, the Agency "re-granted" the operating permit on December 18, 1975. (Appendix A, p. 14 & 16)

April 8, 1975 -- Bemis on this date, filed with the Pollution Control Board a Petition for Variance from Rules 103(b)(6)(E), 103 (b)(6)(G), 104, 204 c)(1)(A) and 204(h) (PCB 75-151). On April 24, 1975, the Board dismissed the Petition as a result of Bemis' failure to show "conformance to ambient air standards." (Appendix C, p. 23)

June 6, 1977 -- By letter of this date, the Agency informed Bemis that their permit for boilers 1 and 2 had expired and that a renewal application was overdue. (Appendix A, p. 13)

June 9, 1977 -- A renewal application for Bemis' boilers 1 and 2 was received by the Agency on this date. (Appendix B, p. 19-20)

August 11, 1977 -- The Agency on this date denied the operating permit requested by Bemis. In denying the permit, the Agency informed Bemis that Bemis had failed to show compliance with Section 9(a) of the Environmental Protection Act and Rules 102 and 308 of Chapter 2 of the Board's Rules and Regulations. (Appendix A, p. 11-12)

March 6, 1978 to Present -- On March 6, 1978, Bemis Company, Inc. filed a motion for designation as an original party in proposed

regulatory change R77-15, "In the Matter Of: Sulfur Dioxide Particulate Regulations, Rule 204(c)(1)(A), Rule 204(c)(1)(D), and Rule 203(g)(1) of Chapter 2." By ruling of the hearing officer, this motion was granted on May 15, 1978. On December 14, 1978, R77-15 was consolidated with R78-14, R78-15, R78-16, and R78-17. At a hearing in the consolidated proposal on April 17, 1979, Bemis proposed an amendment to allow Bemis a sulfur dioxide standard of 6.8 pounds of sulfur dioxide per mm BTU actual heat input.

May 4, 1979 -- In a letter to Mr. K. R. Slane of Bemis Company, Mr. Richard L. Jennings of the Agency's Division of Air Pollution Control, Field Operations Section informed Bemis that the company was operating in violation of Rules 102, 103(b) and 308 of Chapter 2 of the Board's Rules and Regulations. (Appendix A, p. 10)

May 30, 1979 -- On this date, representatives of Bemis met with personnel from the Agency's Peoria regional office to discuss the violations alleged in the Agency's May 4, 1979 letter. (Appendix A, p. 9)

V. PERMIT STATUS

Bemis Company, Inc. has not possessed a valid operating permit for its Peoria facility since May 4, 1977.

VI. VIOLATIONS

1. Illinois Environmental Protection Act, Section 9(a), Ill. Rev. Stat., Ch. 111 1/2, Section 1009(b), (1977):

No person shall:

Construct, install, or operate any equipment, facility, vehicle, vessel, or aircraft capable of causing or contributing to air pollution or designed to prevent air pollution, of any type designated by Board regulations, without a permit granted by the Agency, or in violation of any conditions imposed by such permit;

DATES

Continuous violation since May 4, 1977.

PROOF

On May 4, 1977, the operating permit for Bemis' Peoria facility expired. An application for renewal was denied by the Agency on August 11, 1977. Thus, since May 4, 1977, Bemis has operated without a permit in violation of Section 9(b) of the Act.

2. Illinois Pollution Control Board Rules and Regulations, Ch. 2, Rule 102 (1980):

No person shall cause or allow the discharge or emission of any contaminant in any State so as, either alone or in combination with contaminants from other sources, to cause or tend to cause air pollution in Illinois, or so as to violate the provisions of this Chapter, or so as to prevent the attainment or maintenance of any applicable ambient air quality standard.

DATES

Continuous violation since March 3, 1978.

PROOF

The subject Bemis facility is located in Peoria Township in Peoria County, an area designated by USEPA on March 3, 1978 as nonattainment for

the sulfur dioxide ambient air quality standard. Being a contributor of excessive sulfur dioxide to the Peoria Township area, Bemis Company, Inc. thus is in violation of Rule 102. (See Appendix D, p. 24-27)

3. Illinois Pollution Control Board Rules and Regulations, Ch. 2, Rule 103(b) (1980):

Prohibition: No person shall cause or allow the operation of any existing emission source or any existing air pollution control equipment without first obtaining an Operating Permit from the Agency...

DATES

Continuous violation since May 4, 1977.

PROOF

On May 4, 1977, the operating permit for Bemis' Peoria facility expired. An application for renewal was denied by the Agency on August 11, 1977. Thus, since May 4, 1977, Bemis has operated without an operating permit in violation of Rule 103(b).

4. Illinois State Implementation Plan, as approved May 31, 1972 (40 CFR 52.720-52.738):

Rules 102 and 103(b) of Chapter 2.

DATES

As shown in paragraphs #2 and 3 above.

PROOF

Rules 102 and 103(b) are elements of the Illinois State Implementation Plan as approved May 31, 1972. Violation of those Rules thus constitutes violation of the State Implementation Plan.

5. Illinois State Implementation Plan, as approved May 31, 1972
(40 CFR 52.720-52.738):

Illinois Pollution Control Board Rules and Regulations, Ch. 2,
Rule 204(c)(1)(A):

Existing Fuel Combustion Sources Located in the Chicago, St. Louis (Illinois) and Peoria Major Metropolitan Areas. No person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any existing fuel combustion source, burning solid fuel exclusively, located in the Chicago, St. Louis (Illinois) and Peoria major metropolitan areas, to exceed 1.8 pounds of sulfur dioxide per million btu of actual heat input, on or after May 30, 1975.

DATES

Continuous violation since May 30, 1975.

PROOF

Since the above final compliance date for emission sources subject to Rule 204 (see Rule 204(h) of Ch. 2), Bemis had burned coal having a sulfur content in excess of that required to show compliance with the standard in Rule 204(c)(1)(A).

VII. PROBLEMS WITH PROOF

No problems with proof are anticipated in this matter. It should be noted, however, that the Agency will be seeking to confirm the sulfur content of the fuel burned by Bemis in the near future.

VIII. TECHNICAL SOLUTIONS

The technical solutions to excessive sulfur dioxide emissions are as follows: burn lower sulfur coal in part or in whole; provide adequate emission controls (i.e., flue gas desulfurization or "scrubbers").

IX. WITNESS LIST

To be provided at a later date.

X. SUGGESTED RELIEF/CHOICE OF FORUM

Relief -- To be determined.

Forum -- United State District Court for Illinois, Central Region,
Peoria Division.

BEMIS COMPANY, INC

BOX 568

PEORIA, ILLINOIS 61651

00220

SHOW NUMBER ON ALL
BILLS OF LADING, IN-
VOICES, AND PACKAGES.

PHONE: AREA CODE 309

682-5404

TELEX: 404-414

BEMIS COMPANY, INC.

FOOT OF SLOAN STREET

PEORIA, ILLINOIS

BEMIS

TO: FREEMAN UNITED COAL
300 WEST WASHINGTON ST.
CHICAGO, IL. 60608
ATTN: JOHN NUGENT

DATE 12/10/82 SHIP VIA TO ARRIVE 1983

ITEM	QUANTITY	DESCRIPTION
		APPROXIMATELY 20,000 TONS OF COAL FOR YEAR OF 1983
		1 1/2" X 28 MESH CRUSHED SCREEN WASHED AND DRIED FROM BUCKHEART MINE SHIPPED VIA RAIL
		TO BE ORDERED OUT AS NEEDED IN SINGLE OR MULTIPLE CAR SHIPMENTS
		COAL SUPPLIED MUST NOT EXCEED A SULFUR CONTENT AS RECEIVED AT 10,500 BTU/LB. - 3.04% AT 11,000 BTU/LB. - 3.21%
		- THIS ORDER CANCELS OUT OUR PREVIOUS PURCHASE ORDER #5505
		<i>Robert</i> 251-V-17-1
		DELIVER TO DOCK #

RECORD OF SHIPMENTS RECEIVED

ITEM	DATE	AMOUNT	BALANCE	ITEM	DATE	AMOUNT	BALANCE	ITEM	DATE	AMOUNT	BALANCE

EQUAL EMPLOYMENT OPPORTUNITY
THE AFFIRMATIVE ACTION CLAUSES REQUIRED UNDER 41 CFR 50-741.4
(RELATING TO THE REHABILITATION ACTS OF 1973 AND 1974 FOR HANDI-
CAPPED WORKERS), 41 CFR 50-250.3 (RELATING TO DISABLED VETERANS
AND VETERANS OF THE VIETNAM ERA) AND EXECUTIVE ORDER 11246 AS
AMENDED BY EXECUTIVE ORDER 11375 (RELATING TO EQUAL EMPLOYMENT
OPPORTUNITY) ARE HEREBY INCORPORATED BY REFERENCE. SELLER
AGREES TO INCORPORATE SUCH CLAUSES WHERE APPLICABLE IN ALL
SUBCONTRACTS.

PURCHASING COPY

TERMS OF SALE AND DELIVERY ARE AS STATED ON REVERSE SIDE OF THIS ORDER.

CUSTOMER COPY

BEMIS COMPANY, INC.

BOX 568

PEORIA, ILLINOIS 61651

BEMIS

06980

SHOW NUMBER ON ALL
BILLS OF LADING, IN-
VOICES, AND PACKAGES.

PHONE: AREA CODE 309

682-5406

TELEX: 404-414

BEMIS COMPANY, INC.

FOOT OF SLOAN STREET

PEORIA, ILLINOIS

FREEMAN UNITED COAL MINING CO.

300 WEST WASHINGTON ST.

CHICAGO, IL. 60608

ATTN: JOHN NUGENT

SHIP TO

DATE	SHIP VIA	TO ARRIVE
12/10/81		YEAR OF 1982

ITEM	QUANTITY	DESCRIPTION
------	----------	-------------

1 APPROXIMATELY 25,000 TONS OF COAL PER YEAR
1 1/2 X 28 MESH CRUSHED SCREEN WASHED AND DRIED FROM
BUCKHEART MINE VIA RAIL

TO BE ORDERED OUT AS NEEDED, IN SINGLE OR MULTIPLE
CAR SHIPMENTS

COAL SUPPLIED MUST NOT EXCEED SULFUR CONTENT AS
RECEIVED AT 10,500 BTU/LB - 3.04%
11,500 BTU/LB - 3.21%

Heck
750-V-17-1 DELIVER TO DOCK # POWER PLANT

RECORD OF SHIPMENTS RECEIVED

ITEM	DATE	AMOUNT	BALANCE	ITEM	DATE	AMOUNT	BALANCE	ITEM	DATE	AMOUNT	BALANCE

EQUAL EMPLOYMENT OPPORTUNITY

THE AFFIRMATIVE ACTION CLAUSES REQUIRED UNDER 41 CFR 50-741.4 (RELATING TO THE REHABILITATION ACTS OF 1973 AND 1974 FOR HANDICAPPED WORKERS), 41 CFR 50-250.3 (RELATING TO DISABLED VETERANS AND VETERANS OF THE VIETNAM ERA) AND EXECUTIVE ORDER 11246 AS AMENDED BY EXECUTIVE ORDER 11375 (RELATING TO EQUAL EMPLOYMENT OPPORTUNITY) ARE HEREBY INCORPORATED BY REFERENCE. SELLER AGREES TO INCORPORATE SUCH CLAUSES WHERE APPLICABLE IN ALL SUBCONTRACTS.

PURCHASING COPY

COMMERCIAL TESTING & ENGINEERING CO.

GENERAL OFFICES: 228 NORTH LA SALLE STREET, CHICAGO, ILLINOIS 60601

AREA CODE 312 726-8434



PLEASE ADDRESS ALL CORRESPONDENCE TO:
16130 VAN DRUNEN RD., P.O. BOX 127
SOUTH HOLLAND, IL 60473
OFFICE TEL. (312) 264-1173

FREEMAN UNITED COAL MINING CO.
300 West Washington Street
Chicago, IL 60606

September 16, 1981

ATTN: Mr. Dick Hampson

Sample identification
by Freeman United Coal Mng. Co.

Kind of sample Coal
reported to us

1-1/4 Mixed Screenings
Track #3

Sample taken at Buckheart Mine #17

Sample taken by Freeman United Coal
Mining Co.

Date sampled 7/20-23/28,30/81

Date received 8/4/81

Analysis report no. 71-75776 page 1 of 2

PROXIMATE ANALYSIS

	As Received	Dry Basis
% Moisture	18.07	-----
% Ash	9.28	11.33
% Volatile	32.98	40.25
% Fixed Carbon	39.67	48.42
	100.00	100.00
Btu/lb.	10431	12732
% Sulfur	2.61	3.18

ULTIMATE ANALYSIS

	As Received	Dry Basis
% Moisture	18.07	-----
% Carbon	57.60	70.31
% Hydrogen	4.03	4.92
% Nitrogen	0.92	1.12
% Chlorine	0.09	0.11
% Sulfur	2.61	3.18
% Ash	9.28	11.33
% Oxygen (diff)	7.40	9.03
	100.00	100.00

SULFUR FORMS

	As Received	Dry Basis
% Pyritic Sulfur	1.04	1.27
% Sulfate Sulfur	0.02	0.02
% Organic Sulfur (Diff)	1.55	1.89
% Total Sulfur	2.61	3.18

FUSION TEMPERATURE OF ASH

	Reducing	Oxidizing
Initial Deformation	1970 °F	2250 °F
Softening (H=W)	2015 °F	2345 °F
Softening (H=1/2W)	2055 °F	2435 °F
Fluid	2100 °F	2535 °F

HARDGROVE GRINDABILITY INDEX = 52 at 12.90% Moisture

EQUILIBRIUM MOISTURE = 16.21

FREE SWELLING INDEX = 2-1/2

Respectfully submitted,
COMMERCIAL TESTING & ENGINEERING CO.

R. A. HOUSER, Manager, Midwest Division



Charter Member

Original Copy Watermarked
For Your Protection

OVER 40 BRANCH LABORATORIES STRATEGICALLY LOCATED IN PRINCIPAL COAL MINING AREAS.

COMMERCIAL TESTING & ENGINEERING CO.

GENERAL OFFICES: 228 NORTH LA SALLE STREET, CHICAGO, ILLINOIS 60601 - AREA CODE 312 726-8434



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Sample taken at Buckheart Mine #17

Sample taken by Freeman United Coal
Mining Co.

Date sampled 7/20-23/28, 30/81

Date received 8/4/81

Analysis report no. 71-75776 page 2 of 2

MINERAL ANALYSIS OF ASH

Percent Weight Ignited Basis

Silica, SiO ₂	45.87
Alumina, Al ₂ O ₃	13.17
Titania, TiO ₂	0.65
Ferric oxide, Fe ₂ O ₃	14.20
Lime, CaO	11.98
Magnesia, MgO	0.73
Potassium oxide, K ₂ O	1.53
Sodium oxide, Na ₂ O	0.68
Sulfur trioxide, SO ₃	10.28
Phos. pentoxide, P ₂ O ₅	0.05
Strontium Oxide, SrO	0.00
Barium Oxide, BaO	0.05
Manganese Oxide, Mn ₂ O ₃	0.16
Undetermined	0.65
	<u>100.00</u>

Alkalies as Na₂O, Dry Coal Basis = 0.19

Silica Value = 63.03

Base: Acid Ratio = 0.49

ESTIMATED VISCOSITY at critical viscosity

temperature of ---- °F = ---- Poises

T₂₅₀ Temperature = 2320 °F

EQUILIBRIUM MOISTURE = 16.21

Fouling Index = 0.33

Slagging Index = 1.56

Respectfully submitted,
COMMERCIAL TESTING & ENGINEERING CO.

R. A. HOUSER, Manager, Midwest Division



Charter Member

Full Copy Watermarked
for Your Protection

VH/kb

COMMERCIAL TESTING & ENGINEERING CO.

GENERAL OFFICES: 228 NORTH LA SALLE STREET, CHICAGO, ILLINOIS 60601

AREA CODE 312 726-8434



PLEASE ADDRESS ALL CORRESPONDENCE TO:
18130 VAN DRUNEN RD., SOUTH HOLLAND, IL 60473
OFFICE TEL. (312) 264-1173

MIDLAND COAL COMPANY
Div. of ASARCO Inc.
P. O. Box 8
Trivoli, IL 61569

October 10, 1980

Sample identification
by Midland Coal Company

This sample is representative of
the 6 automatically sampled train
shipments made 12 Aug. - 10 Sept. 1980

Kind of sample reported to us Ill. #5, 1-1/4" x 0
when sampled
Sample taken at Rapatee Mine

Sample taken by Automatic sampler

Date sampled 8/12, 9/10/80

Date received 9/23/80

P. O. No. B 77-0

Analysis report no. 71-55947

PROXIMATE ANALYSIS			ULTIMATE ANALYSIS		
	As received	Dry basis		As received	Dry basis
% Moisture	16.27	xxxxxx	Moisture	16.27	xxxxxx
% Ash	10.71	12.79	Carbon	58.97	70.43
% Volatile	32.28	38.55	Hydrogen	4.03	4.81
% Fixed Carbon	40.74	48.66	Nitrogen	0.84	1.00
	100.00	100.00	Chlorine	0.05	0.06
Btu/lb.	10562	12614	Sulfur	2.39	2.85
% Sulfur	2.39	2.85	Ash	10.71	12.79
% Alk. as Na ₂ O	xxxxxx	0.22	Oxygen (diff)	6.74	8.06
				100.00	100.00
SULFUR FORMS			MINERAL ANALYSIS OF ASH		
% Pyritic Sulfur	0.95	1.13		% Weight Ignited Basis	
% Sulfate Sulfur	0.02	0.02	Silica, SiO ₂	48.34	
% Organic Sulfur	1.42	1.70	Alumina, Al ₂ O ₃	12.85	
WATER SOLUBLE ALKALIES			Titanium, TiO ₂	0.70	
% Na ₂ O =	xxxxxx	xxxxxx	Ferric oxide, Fe ₂ O ₃	11.61	
% K ₂ O =	xxxxxx	xxxxxx	Lime, CaO	11.84	
FUSION TEMPERATURE OF ASH			Magnesia, MgO	0.90	
	Reducing	Oxidizing	Potassium oxide, K ₂ O	1.76	
Initial Deformation	2010 °F	2100 °F	Sodium oxide, Na ₂ O	0.60	
Softening (H = W)	2150 °F	2210 °F	Sulfur trioxide, SO ₃	10.32	
Softening (H = 1/2 W)	2190 °F	2270 °F	Phos. pentoxide, P ₂ O ₅	0.18	
Fluid	2410 °F	2460 °F	Undetermined	0.62	
% EQUILIBRIUM MOISTURE =	14.92			100.00	
HARDGROVE GRINDABILITY INDEX =	57 @ 8.34% Moisture		SILICA VALUE =	66.50	
FREE SWELLING INDEX =	2-1/2		BASE: ACID RATIO	0.43	
			T ₂₅₀ Temperature =	2375 °F	

*These ignited basis results were used
to calculate undetermined value above:

% Strontium Oxide, SrO 0.01
% Barium Oxide, BaO 0.03
% Manganese Oxide, Mn₂O₄ ... 0.24

Respectfully submitted,
COMMERCIAL TESTING & ENGINEERING CO.

R. A. Houser

R. A. HOUSER, Manager, Midwest Division



Charter Member

90 HOLLAND, IL • BILLINGS, MT • BIRMINGHAM, AL • CHARLESTON, WV • CLARKSBURG, WV • CLEVELAND, OH • DENVER, CO • GOLDEN, CO
HENDERSON, KY • MIDLESHORO, KY • MOBILE, AL • NEW ORLEANS, LA • NORFOLK, VA • PIRLVILLE, KY • VANCOUVER, B.C. CAN.

MIDLAND CO/ COMPANY

RAPA TEE

MINE

COAL ANALYSIS

Date Sampled: 9/9,10/82	Date Sampled: 9/22,24,27,29,30/82
Sampled By: R. Lloyd	Sampled By: R. Lloyd
Analysis By: Kauffman & J. Miller	Analysis By: Kauffman & J. Miller
Lab Date: 9/11/82	Lab Date: 10/7/82
Size: 1 1/4 x 0 Total Product	Size: 1 1/4 x 0 Total Product
Vein: Illinois # 5	Vein: Illinois # 5
Identification: Truck Coal From Loadout Belt 2x5 Gal Sample	Identification: Truck Coal 60 Gal Sample

	AS REC'D	DRY	MBAP		AS REC'D	DRY	MBAP
Moisture	17.31			Moisture	16.85		
Ash	10.15	12.27		Ash	10.03	12.06	
Sulfur	2.35	2.84*		Sulfur	2.54	3.05*	
BTU	10,448	12,635	14,402	BTU	10,537	12,672	14,410

Date Sampled: _____	Date Sampled: _____
Sampled By: _____	Sampled By: _____
Analysis By: _____	Analysis By: _____
Lab Date: _____	Lab Date: _____
Size: _____	Size: _____
Vein: _____	Vein: _____
Identification: _____	Identification: _____

	AS REC'D	DRY	MBAP		AS REC'D	DRY	MBAP
Moisture				Moisture			
Ash				Ash			
Sulfur				Sulfur			
BTU				BTU			

R. Kropp R. Gilstrap D. Lidwell
R. Lloyd B. Fox G. Sutherland B. Hunsley

Division Lab _____ Division Lab.
P.J. Moffett
Chemist _____ Chief Engineer.

PDD

File 143065AA./ENF

cc: MAZ (2)
Permits

RECEIVED 5AC

JUL 05 1983

Mr. C. H. Neptun
Peoria Paper Mill
Bemis Company, Incorporated
P.O. Box 568
Peoria, Illinois 61651

Re: Boiler Compliance Status

Dear Mr. Neptun:

As discussed by Messrs. Roy Harsch and John Gaitskill on June 27, 1983, this letter clarifies the compliance status of the Bemis Company, Inc.'s coal fired boiler at the Peoria Paper Mill regarding sulfur dioxide emissions.

Coal analysis data sent in your letters dated April 6, 1983 and April 29, 1983 were examined to determine compliance with Illinois State Implementation Rule 204(c)(1)(E). This rule sets the sulfur dioxide emission limit for boiler operation at the Bemis Paper Mill. The data indicate the boiler to be in compliance with the above rule. Based upon the compliance determination, the United States Environmental Protection Agency does not intend to take any action regarding Notice of Violation No. EPA-5-81-A-5. Please be reminded that you must continue to comply with the applicable rules of the Illinois State Implementation Plan. Thank you for your cooperation.

If you have any questions please contact John Gaitskill at (312) 886-6797 or Catherine Fox at (312) 886-6849.

Very truly yours,

Larry F. Kertcher, Chief
Air Compliance Branch

cc: Daniel Goodwin, Manager ✓
Division of Air Pollution Control
Illinois Environmental Protection
Agency

Roy Harsch
Martin, Craig, Chester & Sonnenschein



217/782-2113

OPERATING PERMIT - REVISED

PERMITTEE

Bemis Company, Inc.
Foot of Sloan Street, Box 568
Peoria, Illinois 61651

Attention: L. J. Rohman

Application No.: 73010712

I.D. No.: 143065AAR

Applicant's Designation: 143-065AAR

Date Received: August 18, 1983

Subject: BOILERS NO. 1 AND NO. 2 WITH PRECIPITATOR

Date Issued: November 9, 1983

Expiration Date: December 1, 1985

Location: Foot of Sloan Street
Peoria, Illinois

Date Revised: January 11, 1984

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of Boilers No. 1 and No. 2 with electrostatic precipitator as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Operation is allowed during malfunction or breakdown for a period not to exceed 4 hours and based upon the following conditions:
 - a. Bemis is allowed 2 hours to analyze the cause of the malfunction,
 - b. Bemis is allowed 2 hours to initiate and complete a fuel switchover from coal to gas or oil or to complete repairs, for internal malfunctions, with return to compliance within 4 hours,
 - c. Bemis is allowed 2 hours to initiate a complete fuel switchover from coal to gas or oil or to complete repairs, for external malfunctions, with return to compliance within 6 hours notwithstanding the 4 hour limitation specified above,
 - d. For purposes of this condition, a malfunction is defined as (i) any period in which stack opacity exceeds 30% for more than 8 consecutive minutes, (ii) any physical breakdown to the electrostatic precipitator resulting in lessening control efficiency and increased particulate emissions over normal operation if such physical breakdown would cause a violation of the standards or limitations set forth in Part II of Chapter 2, or (iii) a complete physical breakdown to one section of the electrostatic precipitator.

B E
1-19-84
Dist 2



Page 2

- e. The electrostatic precipitator shall be inspected for proper operation at least once every 2-1/2 hours.
2. Stack opacity in excess of that allowed by Rule 202(b) is not allowed during startup.
3. The Permittee shall notify the Agency's regional office by telephone as soon as possible during normal working hours upon the occurrence of excess emissions due to malfunctions, or breakdowns. The Permittee shall comply with all reasonable directives of the regional office consistent with special condition 1 regarding such malfunctions and breakdowns. Within five (5) working days of such occurrence the Permittee shall give a written follow-up notice to the Agency's regional office providing an explanation of the occurrence, the length of time during which operation continued under such conditions, measures taken by the Permittee to minimize excess emissions and correct deficiencies, and when normal operation resumed.
4. The Permittee shall maintain records of excess emissions during malfunctions and breakdowns. As a minimum, these records shall include:
 - (i) a full and detailed explanation of why such excess emissions occurred;
 - (ii) the length of time during which operation continued under such conditions;
 - (iii) the measures used to reduce the quantity of emissions and length of time during which such operations occurred; and
 - (iv) the steps the Permittee will take to prevent similar malfunctions or breakdowns.

These records shall be available to representatives of the Agency during normal working and/or operating hours.

Bharat Mathur, P.E.
Manager, Permit Section
Division of Air Pollution Control

BM:PMO:hv/00600/10-11

cc: Region 2

PDD
1/11/84